

DISPUTE RESOLUTION PROCEDURE

Puerto Rico Telephone and PRTLD

PUERTO RICO TELEPHONE AND PRTLD

Administrative Guide

PRT and PRTLD

1515 4th. Floor, Roosevelt Avenue, Caparra PR 00920
Phone 787.775.7677 • Fax 787.783.9236

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Introduction

This document provides the Dispute Resolution process for PRT and PRTLD. This is in accordance to the FCC Remand Order which requires the facilities-based long distance carriers to retain, for 18 months after the close of the claim quarter, the verification data to support the call volumes reported. The verification data must include the date and time of the call and must be provided to the PSP upon request.

PRT and PRTLD reserve the right to alter this document at anytime to improve the content and clarity of the information communicated. Changes to the FCC requirements may also direct changes made to this document.

Process

For example, PRT and PRTLD receive PSP requests through the NPC, and also could receive the same from the listed companies on Attachment A.

The processing of each request includes the following:

- Each request made for date and time detail will be sent in a specific format as defined in the document.
- The Clearinghouse finds format or content errors. Those errors are sent to PRT / PRTLD via Email on floppy contained attached files.
- Each request will be unique to a specific PSP ID and NPC Client ID. A separate file is required for each request.
- The Clearinghouse will report the results of the ad-hoc request in a specific file format as. The PRT/PRTLD correction return file will be written to a CD and mailed to the requestor.

SUBMISSION MEDIA

The request files can be submitted to the Clearinghouse, via a DOS format 3.5" disk, or CD or via an email attachment.

SUBMISSION FILE

The submission file must be an ASCII file.

The following is an explanation of the FCC's requirement that PRT/PRTLD's report payphone information each quarter for each customer having COCOT lines in the

PRT/PRTLD's operating territory. This is a reminder to report this data in accordance with the dates outlined below:

PRT/PRTLD - Data Submission

Per the FCC Record dated November 7, 1996 - FCC Docket No. 96-388, every PRT/PRTLD is required to submit PRT/PRTLD payphone data each quarter:

"112. ... We also conclude that we should require that each PRT/PRTLD must submit to each carrier-payors on a quarterly basis a list of ANIs of all payphones in the PRT/PRTLD's service area...."

PRT/PRTLD Data is due by the last business day of the first month following the end of each quarter.

Directions for Resolving Disputes

1. Check which carrier disputes you are attempting to resolve with the attached documents.

National Payphone Clearinghouse (for error Codes 2, 3, 4, 5, 6)

Sprint (for Error Codes N, X, L, C)

Billing Concepts (for Error Codes A2, B2, A1, B1)

2. Verify that you are sending the correct documents for the particular dispute (only one form of the documentation mentioned below is needed for each disputed ANI)

Letter from the PRT and PRTLD, which meets all of the following:

- On PRT and PRTLD letterhead
- Signed and dated by PRT and PRTLD representative
- Lists disputed ANIs with area codes and installation dates
- The date of the letter falls after the last day of the quarter in which the ANI is in dispute.

1. If telephone number is inactive, verify disconnection date in archive systems and determine whether payment was affected by disconnect date.
2. If the telephone number is active, check billing systems to verify Vendor installation date and determine whether payment was affected by installation date.
3. Check payment status in Customer Information Database System (CIDS) for the period in question. Determine if all of the PSP's valid ANIs was included, and confirm completed call volume and total payment.

4. If Vendor or payment is not found in Customer Information Database System (CIDS), refer to Wholesale Assurance and Fulfillment Manager to investigate if a system problem was involved.
5. Upon completion of investigation, implement resolution as follows:
 - A. Contact PSP to review findings and agree on means of closure
 - B. Stop payment on original check and reissue if check was sent but not received
 - C. Initiate payment on new check if original check was never sent
6. If the customer is a Non- PRT and PRTLTD Vendor, after investigation, refer customer back to its Local Service Provider for submission verification:
 - A. If PSP's ANIs were not reported properly to PRT/PRTLTD (thus resulting in non-payment), Local Service Provider must submit to PRT/PRTLTD an ANI verification list to the Wholesale Service - Marketing Strategy Manager.
 - B. If PSP's ANI's were reported properly to PRT/PRTLTD, refer case to PRT Wholesale Service - Marketing Strategy Manager to make corrections and remit payment promptly.

Dispute Codes Defined:

A dispute ANI is “unpaid” by the Clearinghouse or any IXC that “verifies” ANI ownership. When an ANI is disputed an Error Code is assigned to that ANI. The various error codes used by each IXC are found below. Also, listed below are the definitions of the error codes and the necessary actions to clear disputes.

NPC Dispute Codes

Error Code 2: Payphone Service Provider (PSP) is claiming the ANI(s); however, there is no Local Exchange Carrier (LEC) information to substantiate the claim. Most common reasons: PRT/PRTLD did not report ANI, or reported after deadline, or reported with wrong area code. Also, if the ANI was disconnected in mid-quarter it will be tagged with error code 2.

Action Step: Submit a letter the PRT/PRTLD stating the install and disconnect dates of the disputed ANI(s). This letter must be on PRT/PRTLD letterhead, containing a PRT/PRTLD employee signature, and should have a date that falls after the last day of the quarter the ANI is in dispute.

Error Code 3: More than one PSP is claiming ownership of the ANI(s).

Action Step: Submit the front page of the bill that has the ANI(s), the company name, and the billing address. In addition, the bill must cover the last month of the quarter the ANI is in dispute.

Error Code 4: The PSP billing information does not match the PRT/PRTLD information supplied to Clearinghouse.

Action Step: Same as for order code 3.

Error Code 5: Error code 2 and 3 affected the ANI(s).

Action Step: Same as for order code 2.

Error Code 6: Error Code 3 and 4 affected the ANI(s).

Action Step: Same as for order code 3 and 4.

Error Code S: ANI affected by an area code split and the wrong area code was submitted by the PSP.

Action Step: Update the area code on your dial around submission program and resubmit the ANI in the next quarter.

Sprint Dispute Codes

N - Not reported by PRT/PRTLD

L – Lost dispute - ANI not paid in your favor

A – Already paid

C – Claimed previously – the ANI was not paid previously and is still in some state of dispute

X – Unresolved – dispute pending

Billing Concepts Codes

Error Code A2: No PRT/PRTLD data received by Billing Concepts to validate the ANI(s).

Action Step: Obtain and send PRT/PRTLD letter listing ANI(s) in dispute with the installation dates. PRT/PRTLD letter must be PRT/PRTLD letterhead, must be signed and dated by PRT/PRTLD representative, and must refer to the requestor company name in the body of the letter.

Error Code B: No PRT/PRTLD data received by BC to validate the ANI(s) and Multiple PSPs claiming the same ANI(s)

Action Step: Same as Code A2

Error Code A1: Billing name and/or address on PSP claim is different than billing name and/or address reported by PRT/PRTLD.

Action Step: Send copy of appropriate month's PRT/PRTLD bill.

Error Code B1: Billing name and/or address on PSP claim is different than billing name and/or address reported by PRT/PRTLD and multiple PSPs claimed the ANI.

Action Step: Same as Code A1.

Dispute Resolution Form:

The form is to be completed by the PSP and the PRT/PRTLTD. Upon completion, it should be returned to Clearinghouse accompanied with a cover letter from PRT/PRTLTD. The cover letter must be on letterhead, signed and dated by PRT/PRTLTD representative.

DISPUTE RESOLUTION FORM

Serving PRT/PRTLD: _____ PRT/PRTLD Contact: _____

PRT/PRTLD Contact's phone number: (____) ____ - ____ PRT/PRTLD Contact's Fax number (____) ____ - ____

COCOT/PSP Contact's Name: _____

COCOT/PSP Company Name: _____

COCOT/PSP Billing Address: _____

COCOT/PSP City: _____ State: _____ Zip Code _____

PSP ID Number: _____

	<u>Disputed ANIs</u>	<u>Install Date</u>	<u>Disconnect Date</u>	<u>Date PRT /PRTLD Verified</u>
1.	_____	_____	_____	_____
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____
4.	_____	_____	_____	_____
5.	_____	_____	_____	_____
6.	_____	_____	_____	_____
7.	_____	_____	_____	_____
8.	_____	_____	_____	_____
9.	_____	_____	_____	_____
10.	_____	_____	_____	_____
11.	_____	_____	_____	_____
12.	_____	_____	_____	_____
13.	_____	_____	_____	_____
14.	_____	_____	_____	_____
15.	_____	_____	_____	_____
16.	_____	_____	_____	_____
17.	_____	_____	_____	_____
18.	_____	_____	_____	_____
19.	_____	_____	_____	_____
20.	_____	_____	_____	_____

The above information will be filled out by the PRT/PRTLD as Local Exchange Company (LEC) on PRT/PRTLD letterhead, and faxed or mailed to: Requestor Address.

Sample PRT letter

July 22, 2004

Becky Earlywine / Kim Smith
National Payphone Clearinghouse
201 East Fourth Street, Room 121-500
Cincinnati, Ohio 45202

Re: LEC report data - 3201 Puerto Rico 2Q2004
Error File Correction

This submission is on response to information received via Email, from your company on July 21, 2004.

Serving LEC: PRTC LEC Contact: Angel Cordero
LEC Contact phone number: 787-775-7601
Facsimile: 787-782-9236
LEC Company name: PRTC
LEC Billing Address: GPO Box 360998
San Juan, PR 00936-0998
LEC City: San Juan State: Puerto Rico
ZIP code: 00936-0998

Please continue with the processing of our LEC report data and include these (See CD data) lines in our data for this processing cycle.

If you need further Information, please call me (787)-775-7677.

Cordially,

Luis Manuel Delgado-Reyes
Marketing Strategy Analyst
Puerto Rico Telephone

Enclosures: CD

Sample PRT letter

November 4, 2003

Nicole Ciezar
Telefonos Publicos de Puerto Rico
18 Jose A. Tony Santana Ave.
Suite 5
Carolina, PR 00979-1533

By facsimile: 78-791-3644

Dear Ms. Ciezar:

Attached please find the list of payphones submitted by your company and verified by us.

All of the payphones listed belongs to the indicated company. Also, if any of these payphones are disconnected then the disconnection date is indicated for each.

If you need further Information, please call me (787)-775-7677.

Cordially,

Luis Manuel Delgado-Reyes
Marketing Strategy Analyst
Wholesale Service Department
Puerto Rico Telephone

Imdr

PRT / PRTL D Dispute Management Contact Information

Primary Contact:

Name: Luis M. Delgado Reyes
Title: Marketing Strategy Analyst
Address: Puerto Rico Telephone and PRTL D, Roosevelt 1515 4th. Caparra, P.R. 00920
Telephone: 787-775-7677
Fax: 787-782-9236
Email: Ldelgad3@prtcmail.prtc.net

Secondary Contact:

Name: Angel Cordero
Title: Marketing Strategy Manager
Address: Puerto Rico Telephone and PRTL D, Roosevelt 1515 4th. Caparra, P.R. 00920
Telephone: 787-775-7601
Fax: 787-782-9236
Email: acordero@prtcmail.prtc.net

ATTACHMENT A (Revised: June 21, 2004)

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Becky Earlywine / Kim Smith
National Payphone
Clearinghouse
201 East Fourth Street, Room
121-500
Cincinnati, Oh 45202

Ruth Jaeger
Vice President
APCC Services Inc.
10302 Eaton Place
Suite 340
Fairfax, VA 22030

Linda Schotte
Tax Rating/DAC Supervisor
Atlantax Systems, Inc.
4360 Chamblee Dunwoody
Road
Suite 230
Atlanta, Georgia 30341

Henry Galindo
DAC Specialist
Billing Concepts
7411 John Smith Drive, Suite
200
San Antonio, Texas 78229-4898

Victoria Rivera
TLD Puerto Rico
Metro Office Park, Street 2
Suite 600
Guaynabo, Puerto Rico 00968

Philip J. Mause
DrinkerBiddle & Reath
1500 K Street N.W.
Suite 1100
Washington, D.C. 20005-1209

Anibal Flores
Lambda Communications Inc.
Professional Office Park,
Tower 2
Calle San Roberto #1000
Reparto Loyola, Barrio
Monacillos
Rio Piedras, Puerto Rico 00926

Melissa Neal
Primus Telecommunications
Inc.
Metro Office Park, Metro Office
#6
Suite 202
Guaynabo, Puerto Rico 00968

Ms. Damaris Calderon
AT&T of Puerto Rico
Road 1, Km 54.3
Bo. Montellanos
Cayey, Puerto Rico 0073

Mr. Anibal Flores
Centennial Puerto Rico License
Corporation
Professional Office Park,
Tower 2
Calle San Roberto #1000
Reparto Loyola, Barrio
Monacillos
Rio Piedras, Puerto Rico 00926